GREENBERG TRAURIG, LLP

Jonathan L. Sulds, Esq. (suldsi@gtlaw.com)

Jeffrey D. Mamorsky, Esq. (mamorskyj@gtlaw.com)

200 Park Avenue

New York, NY 10166

Tel: (212) 801-9200

Attorneys for Defendant Pension Plan for Insurance Organization

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

12-cv-08889-(AKH)

LAURENCE J. SKELLY and ELLEN BURKE.

v.

individually and on behalf of all others similarly NOTICE OF DEFENDANT

situated, PENSION PLAN FOR

INSURANCE ORGANIZATIONS'

Plaintiffs, MOTION FOR DISMISSAL OF

PLAINTIFF'S COMPLAINT **PURUSANT TO RULE 12(b)(6)**

(JOINING IN THE PENDING

INSURANCE SERVICES OFFICE INC. AND MOTION OF DEFENDANT THE PENSION PLAN FOR INSURANCE INSURANCE SERVICES

ORANIZATIONS OFFICE, INC. FILED

JANUARY 31, 2014)

Defendants.

----X (Oral Argument Requested)

PLEASE TAKE NOTICE that, upon the Declaration of Robert W. Rachal attorney for Defendant Insurance Services Office Inc., and the Notice of Motion, and the Memorandum of Law of Defendant Insurance Services Office Inc. In Support of its Motion for Dismissal of Plaintiff's Complaint pursuant to Rule 12(b)(6), Federal Rules of Civil Procedure, each filed herein on, January 31, 2014 (Docket #'s 38, 39, 40) and all prior proceedings had herein, Defendant, The Pension Plan for Insurance Organizations, will move this Court before the Honorable Alvin K. Hellerstein at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312 at a date and time to be set by the Court for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiff's Complaint, with prejudice, and for such other relief as this Court may deem just and

proper. By this Notice of Motion, Defendant Pension Plan for Insurance Organizations joins the aforesaid Motion of Defendant Insurance Services Office Inc. and adopts the arguments set forth therein.

Dated: February 14, 2014

Respectfully Submitted,

GREENBERG TRAURIG, LLP

Jonathan/L. Sulds (suldsj@gt/aw.com)

Jeffrey D. Mamorsky, Esq. (mamorskyj@gtlaw.com)

200 Park Avenue New York, NY 10166 Tel: (212) 801-9200

Attorneys for Defendant Pension Plan

for Insurance Organization